

Akin Gump

STRAUSS HAUER & FELD LLP

KATHERINE M. KATCHEN

+1 215.965.1239/fax: +1 215.965.1210
kkatchen@akingump.com

November 27, 2019

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: MDL 1358 / MTBE, *New Jersey Department of Environmental Protection, et al.*
v. Atlantic Richfield Co., et al., No. 1:08-cv-00312-VSB

Dear Judge Broderick,

As the parties recently advised the Honorable Freda L. Wolfson of the United States District Court for the District of New Jersey, Plaintiffs and Defendants Getty Petroleum Marketing, Inc., Lukoil Americas Corporation, Lukoil North America, LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil, and their related entities, have reached a settlement in the New Jersey MTBE litigation. The settlement is subject to, among other things, the statutory notice and public comment process, and final approval by the Attorney General and the Commissioner of the New Jersey Department of Environmental Protection.

In light of the settlement, the foregoing parties jointly and respectfully request an extension of time through February 3, 2019, in which to answer, move or otherwise respond to the Fifth Amended Complaint.

The Parties have signed the enclosed stipulation, and we respectfully request your signature on the enclosed "Stipulation and [Proposed] Order."

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine Katchen" followed by a stylized monogram or initials "DK".

Katherine M. Katchen

Enclosure

cc: All counsel of Record (via LNFS)